

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

BENJAMIN RIEVES,

Defendant.

CIVIL ACTION

FILE NO.: 1:24-cv-04913

DAMAGES AFFIDAVIT

STATE OF Ohio §
COUNTY OF Franklin §

BEFORE ME, the undersigned authority, on this day personally appeared Heather A. Anderson, who after being duly sworn, deposed and stated under oath as follows:

1. My name is Heather A. Anderson. I am over twenty-one years of age, of sound mind, and otherwise competent to testify to the matters set forth herein. I am an Authorized Signing Officer for JPMorgan Chase Bank, N.A. ("**Chase**"). I have access to Chase's books and records ("**Business Records**"), and I am authorized to make this affidavit on behalf of Chase. The statements herein are based upon my personal knowledge obtained from my review of Chase's Business Records and all such statements are true and correct.

2. Due to the nature and scope of my employment duties, I have continuing access to Chase's Business Records and have personal knowledge of Chase's procedures for creating and maintaining these records. Chase's Business Records: (a) are made at or near the time of the occurrence of the matters set forth therein; (b) are made by, or from information transmitted by, persons with knowledge and a business duty to report, or are made by a computer or other similar digital means which contemporaneously records an event as it occurs; (c) are kept in the course of Chase's regularly conducted business activities; and (d) it is the regular practice of Chase to make such records.

3. Chase's Business Records show that Benjamin Rieves ("*Defendant*") opened the Chase bank account that is the subject of the above-captioned action (the "*Account*") in Georgia. The last four digits of the Account number are 8260. When opening his Account, Defendant agreed to abide by all terms and conditions in Chase's Deposit Account Agreement and Privacy Notice (the "*DAA*"),¹ which governs Defendant's relationship with Chase.

4. On August 29, 2024, Defendant deposited a check (the "*Check*") into his Account in the amount of \$80,365.28 (the "*Funds*"). After the deposit, Defendant made several significant withdrawals and transfers of the Funds.

5. On September 4, 2024, the Check was rejected by the alleged issuing

¹ A true and correct copy of the DAA in effect during the relevant events is attached to the Complaint as **Exhibit A**.

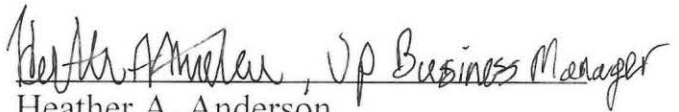
bank and returned as counterfeit. The Check's return resulted in a substantial negative balance on the Account.

6. Defendant has failed to pay the overdraft balance on the Account, despite Chase making demand for payment. The balance on the Account remains due and owing.

7. Chase provided Defendant with periodic billing statements for the Account, which describe the transactions, interest, fees, payments, and the amount due on the Account. A true and correct copy of the last periodic billing statement provided to Defendant is attached hereto as **Exhibit A-1**.


8. The balance due and owing on the Account as of the signing of this affidavit is \$76,864.73.

I declare under penalty of perjury that the foregoing is true and correct.


Heather A. Anderson

SUBSCRIBED AND SWORN TO BEFORE ME on January 29, 2025.




Notary Public

Mariesa Heath

Exhibit A-1

DUPLICATE STATEMENT



JPMorgan Chase Bank, N.A.
P O Box 182051
Columbus, OH 43218 - 2051

September 27, 2024 through October 17, 2024

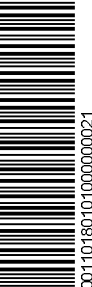
Account Number: [REDACTED] 8260

CUSTOMER SERVICE INFORMATION

Web site: **Chase.com**
Service Center: **1-800-935-9935**
Para Espanol: **1-877-312-4273**
International Calls: **1-713-262-1679**
We accept operator relay calls

00011018 DRE 121 211 29224 NNNNNNNNNN 3 000000000 18

BENJAMIN D RIEVES



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CHECKING SUMMARY

Chase Total Checking

	AMOUNT
Beginning Balance	-\$80,364.73
Deposits and Additions	80,364.73
Ending Balance	\$0.00

Your account was closed with a negative balance of \$80,364.73. We may contact you about this amount.

DEPOSITS AND ADDITIONS

DATE	DESCRIPTION	AMOUNT
10/17	Account Closed	\$80,364.73
Total Deposits and Additions		\$80,364.73

OVERDRAFT FEE SUMMARY

	Total for This Period	Total Year-to-date
Total Overdraft Fees	\$0.00	\$1,054.00



September 27, 2024 through October 17, 2024

Account Number: [REDACTED] 8260

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS:

Call us at 1-866-564-2262 or write us at the address on the front of this statement immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt.

For personal accounts only: We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number;
- A description of the error or the transaction you are unsure about, and why you think it is an error or want more information; and
- The amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

For business accounts, see your deposit account agreement or other applicable agreements that govern your account for details.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC FUNDS TRANSFERS: Contact us immediately if your statement is incorrect or if you need more information about any non-electronic funds transfers on this statement. For more details, see your deposit account agreement or other applicable agreements that govern your account.

JPMorgan Chase Bank, N.A. Member FDIC
